

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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KENNETH E. SAVAGE, JR.,

PLAINTIFF,

VS.

NO. 2:14-cv-02057-STA-dkv

FEDERAL EXPRESS CORPORATION,  
D/B/A FEDEX EXPRESS, FEDEX  
CORPORATION EMPLOYEES' PENSION  
PLAN, FEDEX CORPORATION RETIREMENT  
SAVINGS PLAN,

DEFENDANTS.

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DEPOSITION

OF

SEAN DRIVER

JUNE 2, 2015

TAMMY WENDEL, LCR, CCR  
4735 Beech Bluff Road  
Beech Bluff, Tennessee 38313  
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8                   This deposition is taken pursuant to  
9 the terms and provisions of the Tennessee Rules  
10 of Civil Procedure.

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1 A P P E A R A N C E S

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3 ON BEHALF OF THE PLAINTIFF:

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6 ATTORNEY AT LAW  
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11 ON BEHALF OF THE DEFENDANTS:

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1 Q. "Terminated/resigned, disposition."

2 What does that mean?

3 A. The employee was terminated and/or  
4 resigned due to the investigation.

5 Q. So based on the table you've given  
6 me, at every place that it says  
7 "terminated/resigned," there's no way for me to  
8 tell whether or not the employee -- he either  
9 resigned or was terminated, correct?

10 A. Correct.

11 Q. Okay. Thank you. And is that  
12 because the -- well, you tell me. It says  
13 "terminated/resigned." Are employees offered  
14 the opportunity to resign?

15 A. The employees do have the right to  
16 resign.

17 Q. Even while under investigation?

18 A. An employee can resign at any time.

19 Q. All right. Now, let's go back to  
20 where it says "Date Pulled." Do you see that?

21 A. Yes.

22 Q. August 31st, 2012, and it says it was  
23 in the second quarter. Is August in the second  
24 quarter?

C E R T I F I C A T E

STATE OF TENNESSEE:

COUNTY OF MADISON:

I, TAMMY W. WENDEL, LCR, and Notary  
Public, Madison County, Tennessee, CERTIFY:

The foregoing proceedings were taken before me at the time and place stated in the foregoing styled cause with the appearances as noted.

Being a Court Reporter, I then reported the proceeding in Stenotype, and the foregoing pages contain a true and correct transcript of my said Stenotype notes then and there taken.

I am not in the employ of and am not related to any of the parties or their counsel, and I have no interest in the matter involved.

I further certify that in order for this document to be considered a true and correct copy, it must bear my original signature and that any reproduction in whole or in part of this document is not authorized and not to be considered authentic. Unauthorized reproduction and/or transfer will be in violation of Tennessee Code Annotated 39-14-149, Theft of Services.

Witness my signature this the \_\_\_\_\_  
day of \_\_\_\_\_, 2015.

TAMMY W. WENDELL, LCR

Notary Public at Large  
For the State of Tennessee  
My Commission Expires:  
February 24, 2016